



DARYL L. FOWLER
County Judge

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FCC Mail Room

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December 1, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Docket No. 12-375 Second Further Notice of Proposed Rulemaking (Inmate Calling Services)

Dear Ms. Dortch,

Our local government is in support of reasonable inmate calling rate and fee reforms and appreciates the efforts of the FCC to protect inmates and their families from paying excessive rates, fees and third-party billed products. Of concern to us, however, is the potential elimination of commission payments which are a vital part of our budget to ensure inmates have unlimited use of the inmate telephones which we provide as a privilege. We are aware of recent rules implemented in the state of Alabama that require reasonable rates and funding fees, but also allow for continued payment of commissions to jails and prisons. We urge the FCC to consider mirroring the overall regulation implemented in that state.

Below are just a few of the costs we incur in offering inmate phone services to our inmates:

- Maintaining phones and monitoring maintenance of phones
- Handling US Marshal inquiries regarding contract inmate phone calls, compliance and reporting
- Bandwidth costs for offering and administering inmate phone platform.
- Storing of calls that are used for court
- Live alert transmission costs to call investigator
- Three-way call detection verification by staff
- Prosecuting or disciplining inmates for crimes committed while using the inmate phones and visitation phones
- Visitation phones (use the same recording and security features as the inmate phones)
- Indigent calling
- Free calls to public defenders, consulates, embassies and private counsel, ombudsmen
- Free calls to bail bond companies
- Free calls to facility commissary providers for ordering
- Free booking calls
- Bonding/holding phones
- Prison Rape Elimination Act (PREA) mandated voicemail systems, handling calls and reporting
- Customer service feature for inmates to report phone problems and grievances.

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- Free inmate voice mail broadcast from facility staff and approved contact list
- Cell phone detection and interception systems
- Free customer service system for inmates – lightens workload of facilities staff
- Transporting inmates to phones and visitation phones
- Listening to calls. After implementing caps on rates, fees and single-payment products, inmates making calls to outside parties will most likely double resulting in doubling the costs of listening to calls and managing inmate calling privileges.
- Providing call recordings to court
- Writing Requests for proposals and handling the bidding process
- Learning how to use the inmate phone system and the myriad of security features
- Litigation resulting from inmates or the public regarding use of the phone system

We would like to make mention that a few inmate phone providers proposed that the FCC eliminate commissions, but we feel that recommendation was in their best interest and not in the best interest of the inmates and the jails. Thank you for understanding our concerns and complexities involved in offering phone services to our varying level of inmates...maximum security, medium and low level security and our juvenile detainees.

Sincerely,



DLF:kw

Xc: Jim Allison, General Counsel
County Judges & Commissioners Association of Texas